

V.

ANGEL R. SERRANO

CASE NO. 08-485-1

RF

FEB - 8 2011

MOTION FOR RELOCATION OF CONFINEMENT.

I, ANGEL R. SERRANO, RESPECTFULLY ASK THIS COURT AND HONORABLE MR. LAGRON DAVIS TO HEAR THIS MOTION FOR THE FOLLOWING REASONS....

1) WHILE AT THE NORTHERN NECK REGIONAL JAIL, I ANGEL R. SERRANO, ASSISTED THE GOVERNMENT, ON A WELL KNOWN GANG MEMBER AT A MURDER TRIAL. WITH MY TESTIMONY, HE WAS CONVICTED AND SENTENCED TO 23 YEARS IN PRISON. AFTER, I TESTIFIED AT THE TRIAL, MY NAME CAME OUT IN THE LOCAL NEWSPAPER TWO TIMES ABOUT MY COOPERATION.

2) AFTER THE NEWSPAPER OCCURANCE, THE GANGMEMBER (MR. DENNIS SALMON) TOOK THE LIBERTY TO EXPOSE MY COOPERATION, AND SHOW EVERY INMATE HE ENCOUNTERS THAT I AM "A SWITCH" THERE HAS ALSO BEEN [REDACTED] CORRECTIONAL OFFICERS HERE AT PLUMMER, THAT HAVE ASSISTED IN EXPOSING MY COOPERATION.

3.) I HAVE HAD SEVERAL INMATES THREATEN TO HURT ME OR KILL ME THE 1ST CHANCE THEY GOT. I AM HARASSED AND THREATENED EVERY TIME I TURN AROUND.

4.) I HONESTLY FEAR FOR MY ULTIMATE SAFETY.

5) I HAVE brought THESE ISSUES to the Jail's Full Attention, to NO Avail. I HAVE REQUESTED Protective Custody AND WAS REFUSED. I HAVE REQUESTED legal Phone calls AND WAS REFUSED. I HAVE REQUESTED to BE TRANSPORTED BACK TO Philadelphia (FDC) OR A SAFER FACILITY AND WAS REFUSED.

*ALL OF THE DOCUMENTS to PROVE THE ABOVE, HAVE BEEN FORWARDED to the US MARSHALS OF Philadelphia SUPERVISOR.

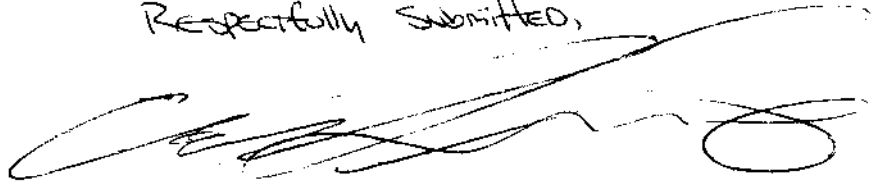
6.) I HAVE become very ill FROM all the STRESS AND CONSTANT Harassment. I ENTERED THE FACILITY all OUT 200lbs I AM DOWN to A THIN 178lbs. THE INMATES MOVE AND SERVE THE FOOD. I HAVE BEEN TOLD "THERE'S SOMETHING SPECIAL ON HERE FOR you "RAT". When I REPORT THIS, THE CIO'S LAUGH, SO A LOT OF DAYS I DO NOT EAT. I AM physically AS WELL AS MENTALLY SICK.

7) I HAVE NO REASON to still be HERE at THIS jail. EVERYDAY I AM HELD HERE, I AM IN DANGER. IF I WOULD'VE KNOWN I WOULD HAVE BEEN "LEFT TO THE WOLVES", I WOULD NOT HAVE PUT MY LIFE IN DANGER to HELP PUT AWAY A MURDERER.

• I, ANGEL B. SERRANO RESPECTFULLY ASK THIS COURT TO PLEASE ACKNOWLEDGE MY MOTION, LOOK INTO THIS MATTER, AND GIVE ME A CHANCE TO STAND BEFORE THE COURT TO PLEAD MY CASE FOR SAFETY. FOR ME TO BE MOVED TO ANOTHER JAIL IS CRUCIAL to MY SAFETY AND WELL BEING.

THANK YOU FOR YOUR TIME IN THIS VERY IMPORTANT MATTER.

Respectfully Submitted,



ANGEL R. SORIANO #62579-088

N.N.R.J.

P.O. Box 1060

WASSAW, VA. 22572

A COPY HAS BEEN SENT TO THE FOLLOWING:

- HONORABLE JUDGE LASCOMBE DAVIS US District Court Rm 6614, 601 Market St Phila, PA 19106
- AUSA. MARK MILLER 615 Chestnut St. suite 1250 Phila, PA. 19106
- ATTORNEY AT LAW JOSE L. ONGAY 521 S. 2ND ST Phila, PA 19147

County/City of Richmond co
Commonwealth/State of VA
The foregoing instrument was acknowledged
before me this 2 day of February,
2011 by Angel Soriano
(name of person seeking acknowledgment)
Edward A. Bryant
Notary Public
My commission expires 12/31/2012

